



Via ECF only

June 19, 2020

Honorable Paul A. Engelmayer
United States District Court, SDNY
40 Foley Square, Room 1305
New York, New York 10007

Re: Roc Nation LLC v. HCC International Insurance Company, PLC
Venue: US District Court - Southern District of New York
Case No.: 1:19-cv-00554-PAE

Dear Judge Engelmayer:

This firm is legal counsel to Houston Casualty Company ("HCC"), improperly pled as HCC International Insurance Company, PLC, regarding the above-referenced matter. We write to request permission, pursuant to § 4.B of Your Honor's individual rules and practices to submit the following document in redacted form:

1. Correspondence of Attny. Andrew D. Kupinse dated June 19, 2020, marked with bates stamp numbers MDD 00636-639

Redactions to the above document have been made as narrowly as possible. In accordance with Your Honor's instructions, the documents have been uploaded via ECF with a limited viewing level restricting viewing to selected parties as we await Your Honor's review of these documents and decision.

Defendant seeks to file the aforementioned document under seal as it contains sensitive and confidential information pertaining to Plaintiff's business operations, financial information, and proprietary information. This information is not available within the public domain and was contemplated by the parties when they jointly drafted and entered into the confidentiality order entered by Your Honor on August 6, 2019. *See* Document No. 42.

Good cause exists for granting this request to file the above-referenced document under seal so that it may include this document in response to Plaintiff's letter setting for the arguments of its potential motion for summary judgment

Thank you for your time and attention to this matter.

Respectfully submitted,
/s/George J. Vogrin
George J. Vogrin

Granted.

SO ORDERED



PAUL A. ENGELMAYER
United States District Judge

June 22, 2020